

Kevin C. Barrett, State Bar No. 8959  
**Barrett & Matura, P.C.**  
7575 Vegas Drive, Suite 150c  
Las Vegas, Nevada 89128  
Telephone: (702) 833-1033  
Facsimile: (602) 792-5710  
[kbarrett@barrettmatura.com](mailto:kbarrett@barrettmatura.com)

*Attorneys for Defendant  
NGM Insurance Company*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

GALLAGHER-KAISER CORPORATION, a Michigan corporation,

Plaintiff,  
vs.

LIBERTY DUCT, LLC, a Nevada limited liability company; BIO SHIELD TECH, LLC, a foreign limited liability company; HARTFORD CASUALTY INSURANCE COMPANY, an Indiana insurance corporation; NGM INSURANCE COMPANY, a Florida corporation; and DOES 1-10 Insurance Company(ies), inclusive,

## Defendants.

NGM INSURANCE COMPANY, a Florida corporation,

Cross-Claimant,  
vs.

LIBERTY DUCT, LLC, a Nevada limited liability company, DOES 1 through 2, inclusive,

## Cross-Defendants.

Defendant, NGM Insurance Company (“NGM”), by and through its attorneys of record, the law firm of Barrett Matura, and Plaintiff, Gallagher-Kaiser Corporation (“GK”), by and through its attorneys of record, the law firm of Peel Brimley LLP, hereby stipulate

Case No. 2:14-cv-00869-GMN-DJA

**STIPULATION AND REQUEST  
FOR ORDER EXTENDING  
DEFENDANT NGM INSURANCE  
COMPANY'S TIME TO REPLY TO  
PLAINTIFF'S RESPONSE TO  
MOTION FOR SUMMARY  
JUDGMENT**

1 and agree to extend the deadline for NGM to file its Reply Brief in Support of its Motion  
 2 for Summary Judgment (“Reply”). The original deadline for NGM to file its Reply is  
 3 August 1, 2025. Due to various scheduling conflicts, NGM has requested, and Plaintiff has  
 4 agreed to, additional time in which to file its Reply. The parties agree and stipulate that  
 5 NGM shall have up to and including Friday, August 29, 2025 to file its Reply Brief in  
 6 Support of Motion for Summary Judgment.

7 Dated this 29<sup>th</sup> day of July, 2025.

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**PEEL BRIMLEY LLP**

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/s/ Cary B. Domina

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Steven D. Meacham (Bar No. 9863)  
 Cary B. Domina (Bar No. 10567)  
 3333 E. Serene Ave., Ste. 200  
 Henderson, NV 8907  
[smeacham@peelbrimley.com](mailto:smeacham@peelbrimley.com)  
[cdomina@peelbrimley.com](mailto:cdomina@peelbrimley.com)  
 Attorneys for Gallagher Kaiser  
 Corporation

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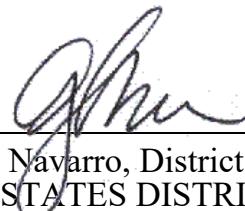
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**BARRETT | MATURA**

/s/ Kevin C. Barrett

Kevin C. Barrett (Bar No. 8959)  
 8925 East Pima Center Parkway  
 Suite 215  
 Scottsdale, Arizona 85258  
[kbarrett@barrettmatura.com](mailto:kbarrett@barrettmatura.com)  
 Attorney for NGM Insurance Company

  
 Gloria M. Navarro, District Judge  
 UNITED STATES DISTRICT COURT

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and transmittal of Notice of Electronic filing to the following CM/ECF registrants, and causing a copy to be mailed to all non-ECF registrants.

/s/ Briana S. Willson  
Briana S. Willson